

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

Omega Honeywood,

Plaintiff,

vs.

Spartanburg Community College,

Defendant.

C/A. No.: 7:23-cv-05749-DCC-MGB

**JOINT DISCOVERY PLAN**

The parties respectfully submit the following information required by Federal Rule of Civil Procedure 26(f) and this Court's Scheduling Order. Counsel for the parties participated in a discovery conference on May 16, 2023. This is the discovery plan resulting from that meeting:

**DISCOVERY PLAN**

**(A) What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement of when disclosures under Rule 26(a)(1) were made or will be made?**

**RESPONSE:** The parties waive Rule 26(a)(1) disclosures.

**(B) The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused upon particular issues.**

**RESPONSE:** Discovery will be conducted on the matters raised in the pleadings. The parties anticipate conducting discovery within the time frame set forth in the Scheduling Order. The parties do not foresee a need for special limitations or phases for discovery.

**(C) Any issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced.**

**RESPONSE:** The parties will default to production in PDF format, but either party may request a native format of a document/file and those requests will be dealt with on a situation-by-situation basis.

**(D) Any issues about claims of privilege or of protection as trial-preparation materials, including—if the parties agree on a procedure to assert these claims after production—whether to ask the court to include their agreement in an order.**

**RESPONSE:** The parties agree to a claw back of inadvertently produced privilege or work product materials.

**(E) What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed?**

**RESPONSE:** None.

**(F) Any other orders that should be entered by the court under Rule 26(c) or under Rule 16(b) and (c).**

**RESPONSE:** None at this time.

Plaintiff:

OMEGA HONEYWOOD

**CROMER BABB PORTER & HICKS, LLC**

BY: s/Chance Sturup

Chance Sturup (#13815)  
1418 Laurel Street, Suite A  
Post Office Box 11657  
Columbia, South Carolina 29211  
Tel: 803-799-9530  
Fax: 803-799-9533  
chance@cbphlaw.com  
*Attorney for Plaintiff*

Defendant:

SPARTANBURG COMMUNITY  
COLLEGE

**GIBBES BURTON, LLC**

BY: s/Stephanie H. Burton

Stephanie H. Burton (#5009)  
308 East Saint John Street  
Spartanburg, South Carolina 29302  
sburton@gibbesburton.com  
Telephone: (864) 327-5000  
Facsimile: (864) 342-6884

*Attorneys for Defendant Spartanburg  
Community College*

Columbia, South Carolina

December 8, 2023